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11 **SECOND IMAGE, INC.**12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**14 **SECOND IMAGE, INC.**, a California
15 corporation,

16 Case No. C-075242 PJH

17 Plaintiff,

18 vs.

19 **RON SIN PHOTOCOPY, Inc.**, a California
20 Corporation; **CHRISTINA SANCHEZ**, an
21 individual; and **DOES 1-10**,

22 Defendants.

23 **DECLARATION OF KARL S.**
24 **KRONENBERGER IN SUPPORT OF**
25 **PLAINTIFF'S OPPOSITION TO**
26 **DEFENDANT RON SIN PHOTOCOPY,**
27 **INC.'S MOTION TO DISMISS**28 Date: December 19, 2007
Time: 9:00 a.m.
Dept.: 319
20
21 The Honorable Phyllis J. Hamilton

22 I, Karl S. Kronenberger, declare as follows:

23 1. I am an attorney admitted to practice in the State of California and the
24 United States District Court for the Northern District of California. I am a partner at the
25 law firm of Kronenberger Burgoyn, LLP, counsel of record for Plaintiff Second Image,
26 Inc. ("Second Image"). Except as otherwise stated, I have personal knowledge of the
facts contained herein.27 2. On or about November 6, 2007, I received a call from Joe Tancredy of
28 Travelers Indemnity Company of Connecticut ("Travelers"). During that call, Mr.

1 Tancredy informed me that Travelers would be responding to Second Image's complaint
2 on behalf of Defendant Christina Sanchez.

3 3. On or about November 26, 2007, my assistant, on my behalf, accessed
4 www.yellowpages.com, and identified several addresses for Defendant Ronsin
5 Photocopy, Inc. ("Ronsin") in California, including in Hayward and Sacramento. At or
6 around that time, my assistant also performed an Internet search for "Ronsin Photocopy"
7 and retrieved a job description posted on the "S.F. Bayarea Craigslist" for a "Field Rep"
8 position. True and correct printouts of relevant pages from the www.yellowpages.com
9 and www.craigstlist.org websites are attached hereto as Exhibit "A".

10 4. On or about November 26, 2007, my assistant accessed the website for
11 Ronsin, www.ronsinphotocopy.com, on my behalf. True and correct copies of printouts
12 from the website are attached hereto as Exhibit "B".

13 5. On its website, Ronsin represents that it "merg[ed] with an existing
14 company." Upon information and belief, the company with which Ronsin merged is
15 Rapid Legal, as a link on Ronsin's website for "Ronsin Legal" redirects the user to Rapid
16 Legal's website, www.rapidlegal.com. Rapid Legal's website states that it has branch
17 locations offices in various locations throughout California, including in Hayward, San
18 Francisco, San Jose, and Sacramento.

19 6. On or about November 27, 2007, my paralegal obtained a Dun &
20 Bradstreet, Inc. Comprehensive Report on Ronsin Photocopy, Inc. (the "Dun &
21 Bradstreet Report") on my behalf. A true and correct copy of the Dun & Bradstreet
22 Report is attached hereto as Exhibit "C".

23 7. On or about November 28, 2007, my assistant, on my behalf, spoke with a
24 representative of the indexing department of the Alameda County Clerk-Reporter's Office
25 regarding two bond reports. True and correct copies of the bond reports are attached
26 hereto as Exhibit "D". The representative informed him that the bond reports concerned
27 Ronsin's status as a Registered Professional Photocopier in Alameda County, California.

28 I declare under penalty of perjury under the laws of the United States that the

1 foregoing is true and correct and that this Declaration was executed this 28th day of
2 November, 2007, at San Francisco, CA.

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/s/
Karl S. Kronenberger

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